

## United States District Court

SOUTHERN

DISTRICT OF  
McALLEN DIVISION

TEXAS

UNITED STATES OF AMERICA

V.

Pedro Maldonado-Chavez

YOB: 2000 COB: Mexico

## CRIMINAL COMPLAINT

Case Number:

M-22-1655-M

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief.

On or about August 18, 2022 in Starr County, in the  
Southern District of Texas

(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Ulises Reyes-Givara and Daisy Torres-De Reyes, citizens and nationals of El Salvador, along with one (1) other undocumented alien, for a total of three (3) who had entered the United States in violation of law, did knowingly transport, or move or attempted to transport said aliens in furtherance of such violation of law within the United States, that is, from a location near Roma, Texas to the point of arrest near Roma, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONYI further state that I am a U.S. Border Patrol Agent and that this complaint is based on the following facts:

On August 18, 2022, at approximately 9:00 pm, a camera operator relayed to Border Patrol Agents he observed approximately seven (7) subjects running north from the Rio Grande River in Roma, Texas. This area is well-known for alien smuggling activities due to its proximity to the river. The camera operator added he observed a Jeep Liberty driving near the area where the subjects were last seen running. Minutes later, a responding Agent saw a tan Jeep Liberty pass his location at a high rate of speed. While the Agent followed the Jeep, he observed it enter a parking lot, turn around, and return south. When the Agent attempted to conduct a vehicle stop, the Jeep drove off a berm and the driver was seen exiting the Jeep while it was moving. The Jeep then collided with a tree and all subjects ran towards the river. Agents were able to apprehend the driver, later identified as Pedro Maldonado-Chavez, and three (3) other subjects. The remaining subjects crossed the river into Mexico. All four (4) subjects were determined to be illegally present in the United States. During the encounter, Maldonado-Chavez was Mirandized, and indicated he was the driver of the Jeep.

All subjects were transported to the Rio Grande City Border Patrol Station for processing.

Continued on the attached sheet and made a part of this complaint:

 Yes  No

Complaint authorized by AUSA R. Guerra

/s/ Jose E. DiazSubmitted by reliable electronic means, sworn to and attested  
telephonically per Fed. R. Cr.P.4.1, and probable cause found on:

Signature of Complainant

Jose E. Diaz Border Patrol Agent

Printed Name of Complainant

August 20, 2022 @ 12:21 p.m.  
Date

at

McAllen, Texas

City and State

Juan F. Alanis, U. S. Magistrate Judge  
Name and Title of Judicial Officer

Signature of Judicial Officer



**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

**M-22-1655-M**

**RE: Pedro Maldonado-Chavez**

**CONTINUATION:**

**PRINCIPAL STATEMENT:**

Pedro Maldonado-Chavez, a national and citizen of Mexico was read his Miranda Rights. He understood but declined to provide a sworn statement without the presence of an attorney.

**MATERIAL WITNESS STATEMENT:**

Ulises Reyes-Givara and Daisy Torres-De Reyes, both citizens and nationals of El Salvador, were read their Miranda Rights. Both understood and agreed to provide a sworn statement without the presence of an attorney.

Reyes-Givara stated he made smuggling arrangements for he and his wife to enter the United States and was charged \$14,000 each. Reyes stated he almost paid the full amount. Reyes said he crossed the river with his wife and several others, by foot, and was led by a guide. Reyes indicated the guide instructed them to cross a road and board a tan Jeep parked nearby. Reyes said the driver of the Jeep, (Maldonado-Chavez), yelled to him "get in the back". Reyes indicated moments later he felt the vehicle hit an object causing the vehicle to stop. Reyes said, once he exited the Jeep, he saw the vehicle stopped by a tree close by the river. After the impact, Reyes heard the driver yelling at them to run towards the river.

Reyes identified Pedro Maldonado-Chavez, through a photo lineup, as the driver of the Jeep.

Torres-De Reyes stated her husband's parents made their smuggling arrangements but did not know how much they paid. Torres indicated she crossed the river with her husband and several other subjects by walking and were guided by a foot guide. Torres added the guide instructed them to cross a road and board a tan Jeep near the road. Torres stated once in the Jeep, she felt it was moving fast. Torres said the Jeep drove over a berm and made impact with a tree located close to the Rio Grande River. Torres indicated they were instructed to run towards the river after the crash.